

ORIGINAL

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)
)
Plaintiff,)
) Civil Action No. 07-CIV-6233 (PKC)
v.) (JHP)
)
MITSUBISHI ELECTRIC CORP.;) MOTION TO ADMIT COUNSEL PRO
MITSUBISHI ELECTRIC US HOLDINGS,) HAC VICE
INC.; MITSUBISHI ELECTRIC AND)
ELECTRONICS USA, INC.; MITSUBISHI)
DIGITAL ELECTRONICS AMERICA,)
INC.; SAMSUNG ELECTRONICS CO.,)
LTD.; SAMSUNG ELECTRONICS)
AMERICA, INC.)
Defendants.)
----- X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James E. Hough, a member in good standing of the bar of this Court, hereby move for an Order in the above matter allowing the admission *pro hac vice* of:

Adam J. LaVier
Morrison & Foerster
555 West Fifth Street, 35th Floor
Los Angeles, CA 90013-1024
Tel: (213) 892-5200
Fax: (213) 892-5454
alavier@mofo.com

Mr. LaVier is a member in good standing of the Bar of the State of California.

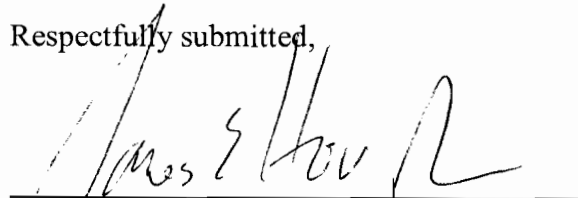
There are no pending disciplinary proceedings against Adam J. LaVier in any State or Federal Court.

In support of this motion and filed concurrently herewith is the Affidavit of James E. Hough in Support of Motion to Admit Counsel Pro Hac Vice and the Proposed Order for Admission Pro Hac Vice on Written Motion.

Dated: September 11, 2007

New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James E. Hough', is written over a horizontal line.

James E. Hough, Esq. (JH-1066)
Morrison & Foerster
1290 Avenue of the Americas
New York, New York 10104-0050
Tel: (212) 468-8000
Fax: (212) 468-7900

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THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)	
)	
Plaintiff,)	
)	Civil Action No. 07-CIV-6233 (PKC)
v.)	(JHP)
)	
MITSUBISHI ELECTRIC CORP.;)	AFFIDAVIT OF JAMES E. HOUGH IN
MITSUBISHI ELECTRIC US HOLDINGS,)	SUPPORT OF MOTION TO ADMIT
INC.; MITSUBISHI ELECTRIC AND)	COUNSEL PRO HAC VICE
ELECTRONICS USA, INC.; MITSUBISHI)	
DIGITAL ELECTRONICS AMERICA,)	
INC., SAMSUNG ELECTRONICS CO.,)	
LTD.; SAMSUNG ELECTRONICS)	
AMERICA, INC.)	
)	
Defendants.)	
-----	X	

James E. Hough, being duly sworn, hereby deposes and says as follows:

1. I am a member of Morrison & Foerster LLP, counsel for Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronics USA, Inc.; Mitsubishi Digital Electronics America, Inc. (collectively, "Mitsubishi") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Mitsubishi's motion to admit Adam J. Lavier as counsel *pro hac vice* to represent Mitsubishi in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have worked with Adam J. Lavier closely for several months.

4. Mr. Lavier is a member of Morrison & Foerster LLP, resident in our office in Los Angeles, California.

5. I have found Mr. Lavier to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Attached hereto as Exhibit 1 is a Certificate of Good Standing for Adam J. Lavier.

6. On August 20, 2007, Plaintiff's counsel, Lee A. Goldberg, was contacted to inform him of our intention to file this motion. Mr. Goldberg has no objection to Mr. Lavier's *pro hac vice* admission.

7. Accordingly, I am pleased to move the admission of Adam J. LaVier, *pro hac vice*.

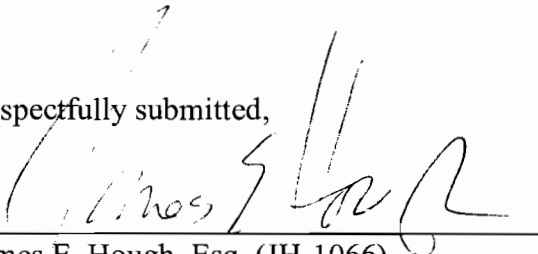
8. I respectfully submit a proposed order granting the admission of Adam J. Lavier, *pro hac vice*, which is attached hereto as Exhibit 2.

WHEREFORE it is respectfully requested that the motion to admit Adam J. Lavier, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: September 11, 2007

New York, New York

Respectfully submitted,



James E. Hough, Esq. (JH-1066)
Morrison & Foerster
1290 Avenue of the Americas
New York, New York 10104-0050
Tel: (212) 468-8000
Fax: (212) 468-7900



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 14, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ADAM JENNINGS LAVIER, #238824 was admitted to the practice of law in this state by the Supreme Court of California on November 22, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA


Kath Lambert

Custodian of Membership Records

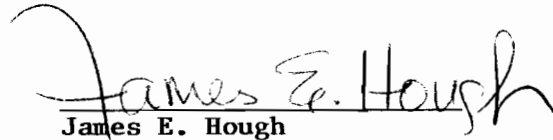
CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT OF JAMES E. HOUGH IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE and PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION was made this 12th day of September 2007, by delivering a true and correct copy of the same by Federal Express Priority Overnight to the following:

Sibley P. Reppert, Esq.
Lahive & Cockfield LLP
One Post Office Square
Boston, MA 02109

Lee A. Goldberg, Esq.
Pearl Cohen Zedek Latzer LLP
1500 Broadway, 12th Floor
New York, NY 10036

Philip A. Irwin, Esq.
Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018


James E. Hough

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THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)	
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Plaintiff,)	
)	Civil Action No. 07-CIV-6233 (PKC)
v.)	(JHP)
)	
MITSUBISHI ELECTRIC CORP.;)	[PROPOSED] ORDER FOR
MITSUBISHI ELECTRIC US HOLDINGS,)	ADMISSION PRO HAC VICE ON
INC.; MITSUBISHI ELECTRIC AND)	WRITTEN MOTION
ELECTRONICS USA, INC.; MITSUBISHI)	
DIGITAL ELECTRONICS AMERICA,)	
INC., SAMSUNG ELECTRONICS CO.,)	
LTD.; SAMSUNG ELECTRONICS)	
AMERICA, INC.)	
)	
Defendants.)	
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Upon the motion of James E. Hough, attorney for Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronics USA, Inc.; Mitsubishi Digital Electronics America, Inc. (collectively, "Mitsubishi") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that
Adam J. Lavier
Morrison & Foerster
555 West Fifth Street, 35th Floor
Los Angeles, CA 90013-1024
Tel: (213) 892-5200
Fax: (213) 892-5454

is admitted to practice pro hac vice as counsel for Mitsubishi in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: September 11, 2007

New York, New York

The Honorable Kevin P. Castel
United States District Judge